

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
DR. THOMAS M. EDSALL, and	)	
GRISEL EDSALL,	)	
Plaintiffs	)	
	)	
v.	)	
	)	CIVIL ACTION NO. 04-40106-FDS
ASSUMPTION COLLEGE, DR.	)	
THOMAS R. PLOUGH, and DR. JOSEPH	)	
F. GOWER,	)	
Defendants	)	
_____	)	

**DEFENDANTS' ANSWER TO COUNTS VIII AND IX**  
**OF PLAINTIFFS' COMPLAINT**

Defendants Assumption College, Dr. Thomas R. Plough, and Dr. Joseph F.

Gower hereby answer count VIII and IX of Plaintiffs' Complaint as follows:

**Count VIII (Dr. Plough and Dr. Gower)**

51. Defendants repeat and re-allege their responses set forth in paragraphs 1 through 50, *supra* as if fully set forth herein.
52. Denied. Plaintiff Edsall had a one year contract from the Fall of 2001 to the Spring of 2002. Mr. Edsall had no contract for the year 2003.
53. Denied.
54. Denied.
55. Denied.

**Count IX (Assumption College, Dr. Plough, Dr. Gower)**

56. Defendants repeat and re-allege their responses set forth in Paragraphs 1 through 55 *supra* as if fully stated herein.

57. Denied.

WHEREFORE, Defendants request this Court dismiss Plaintiffs' claims, enter Judgment on behalf of Defendants, award Defendants their costs in defending this action, and grant such other relief as the Court may consider to be just and proper.

Defendants demand a **Jury Trial** on all issues so triable.

Dated: May 3, 2005

Respectfully submitted,

Defendants,

ASSUMPTION COLLEGE,  
DR. THOMAS R. PLOUGH,  
DR. JOSEPH F. GOWER,

By their attorneys,

\_\_\_\_\_/s/ Douglas F. Seaver  
Douglas F. Seaver (BBO# 450140)  
Hinckley, Allen & Snyder LLP  
28 State Street  
Boston, MA 02109-1775  
(617) 345-9000

**CERTIFICATE OF SERVICE**

I, Douglas F. Seaver, hereby certify that I have this 3rd day of May 2005 forwarded a copy of the Defendants' Answer to Counts VIII and IX of Plaintiffs' Complaint by email and first class mail, postage pre-paid to Plaintiffs' counsel of record: James B. Krasnoo, Esq. & Paul J. Klehm, 23 Main Street, Terrace Level, Andover, MA 01810 and by first class mail to Karim Kamal, Esq., 630 Fifth Avenue, Suite 3163, New York, N.Y. 10111

\_\_\_\_\_/s/ Douglas F. Seaver  
Douglas F. Seaver